



SEMS DocID

2261227

ORIGINAL
(Red)

-----DRAFT-----

SUBJECT: Justification for Approval of a Funding Request
for Removal Action at the Shaffer Equipment
Site,
Minden, Fayette County, West Virginia

FROM: Robert E. Caron, On-Scene Coordinator
Eastern Response Section (3HW31)

TO: Edwin B. Erickson
Regional Administrator (3RA00)

THRU: Abraham Ferdas, Acting Director
Office of Supperfund (3HW02)

I. ISSUE

The Shaffer Equipment Site in Minden, Fayette County, West Virginia, has been reassessed in accordance with the National Contingency Plan (NCP), 40 CFR, Part 300. The findings of this assessment indicate that a threat to human health and the environment is presented by the Shaffer Equipment Site. This site was cleaned up in a previous removal action but recent activity at the site require further removal actions. I have determined that this site meets the criteria for initiating a removal action under Section 300.415 of the NCP.

II. BACKGROUND

A. Site Description

The Shaffer Equipment Site became a CERCLA Removal Project on December 26, 1984. Acting Regional Administrator Thomas P. Eichler initially approved \$175,000 to activate the site. Several additional funding requests have been approved to raise the final total project costs to \$3,755,447. The 6-month and \$1 million exemption request was approved on August 29, 1985. A copy of each of the previous funding requests is attached.

Site removal activities included rerouting underground water lines, site stabilization, onsite treatment of the PCB-contaminated soils, removal of 4,735 tons of contaminated materials, and site restoration. Details of previous work can be found in the attached funding. The Shaffer Equipment Company was an operating firm during this period of time.

On December 10, 1987, all removal operations were thought to be complete. Since then, through the Preremedial

*****DRAFT*****

Program EPA has undertaken a site inspection of the areas adjacent to the site. On March 20 and 21, 1990, EPA Preremedial conducted sampling at the site. Six soil samples exceeded the 50 parts per million (ppm) polychlorinated biphenyl (PCB) removal action level limit set EPA.

The Removal Program was notified of these findings and an On-Scene Coordinator was assigned to investigate and sample to confirm them. Samples taken at the OSC's direction by the Roy F. Weston Technical Assistance Team (TAT) on May 22, 1990, confirmed these results in all but one area. In general, the areas where removal actions were undertaken during 1984 and 1985 were below the 50 ppm action level. Areas immediately surrounding the building and areas where previous company activity occurred were found to be contaminated with PCBs in excess of 50 ppm. The OSC is of the opinion that this contamination is new, as previous sampling of these areas in 1985 showed no levels of concern.

As a result of the sampling on May 22, 1990, the OSC performed a more extensive sampling to better define the contaminated areas. These results indicate that approximately one acre of property around the building and several scattered areas contain PCB levels above the action level of 50 ppm. The attached table shows sampling results and the corresponding map shows areas to which they pertain. The contamination is spotty and appears to be associated with building cleanout after the closure of Shaffer Equipment in 1988. In addition, one area appears to have been recently contaminated. Analysis of the chromatography of a sample from that area indicates that the PCB oil is not weathered. The other areas of contamination are found around the building, which was an active facility during the original cleanup.

Upon review of the latest sampling data, the OSC recommends that any contamination found above the 50 ppm PCB action level be removed in order to remain consistent with the risk-based levels already set for this site. This Action Memorandum is in support of that objective.

The statutory criteria as specified in CERCLA for exemptions to the original 6-month and one-year limit still exist at this site.

The site is currently not on the National Priorities List (NPL) and is not likely to score high enough to rank.

*****DRAFT*****

B. Quantities and Types of Substances Present

An assessment performed at the Shaffer Equipment Site by the OSC and TAT on June 14, 1990, involved gridding three areas around the building and taking random samples within the grid. Random soil samples were also collected at the OSC's discretion.

All of the samples were collected using EPA sampling protocols. Samples were shipped to Environmental Health Research and Testing, Inc. (EHRT), located in Cincinnati, Ohio for the following analyses:

PCBs by EPA Method 8080
PCB/BNA by EPA Method 8270/8080

Quality Assurance/Quality Control (QA/QC) of the analytical results were conducted by TAT, and the data were found to be acceptable.

C. State and Local Authorities Roles

An active citizens group exists in the community. Their efforts have included seeking the assistance of Senator Rockefeller and Congressman Staggers of West Virginia. Both Senator Rockefeller and Congressman Staggers have shown great concern for the conditions that exist at the Shaffer Equipment Site.

III. THREAT TO PUBLIC HEALTH OR WELFARE AND THE ENVIRONMENT

Conditions at the Shaffer Equipment Site pose an immediate threat to human health, welfare, and the environment. Section 300.415 of the National Contingency Plan lists the factors to be considered in determining the appropriateness of a removal action. Section 300.415, paragraphs (b)(2)(i), (iv) and (v) all directly apply to the situation which exists at the Shaffer Equipment Site.

300.415 (b)(2)(i) "Actual or potential exposure to nearby human populations, animals, or the food chain from hazardous substances, pollutants or contaminants."

Random sampling has indicated that PCB levels exceed action levels or are approaching action levels. The site is located in a populated area with an estimated 65 to 75 residences within a 1/8-mile radius of the site. Residences downstream of the Shaffer Equipment Site are also a concern because the PCBs are found in low lying

*****DRAFT*****

3. Backfill excavated areas when "clean."
4. Initiate waste disposal arrangements.
5. Demobilize all contractor equipment and personnel from site.

Phase III: 1. Transport and dispose of hazardous waste to a RCRA-approved facility.

At this time, it is estimated that this additional removal will run less than the statutory 12-month limit, barring any unforeseen circumstances or disposal restrictions.

B. Summary of Costs

	CURRENT CEILING	ADDITIONAL FUNDS	NEW CEILING
Extramural Costs	\$3,451,205	\$578,000	\$4,029,205
ERCS Contractor (including subcontractor, disposal, and contingency)	-	-	-
TAT	94,506	12,023	106,529
USCG	65,329	-	65,329
Extramural Subtotal	\$3,611,040	\$590,023	\$4,201,063
Intramural Costs			
EPA Direct	52,149	10,248	62,397
EPA Indirect	92,258	16,016	108,274
Intramural Subtotal	\$ 144,407	\$ 26,264	\$ 170,671
15% Project Contingency	-	88,503	88,503
TOTAL PROJECT CEILING	\$3,755,447	\$704,490	\$4,460,237

*****DRAFT*****

areas that are subject to flooding from Arbuckle Creek. It has been demonstrated that PCB migration via Arbuckle Creek has occurred in the past. There is evidence that local residents enter the site. During site visits, the OSC observed fresh tracks from all-terrain vehicles through the areas of concern. Such vehicles increase the risk of direct contact by stirring up dust.

300.415 (b) (2) (iv) "High levels of hazardous substances or pollutants or contaminants in soils largely at or near the surface, that may migrate."

Random sampling has indicated that PCB levels in the soil exceed the EPA action level or are approaching the action level.

300.415 (b) (2) (v) "Weather conditions that may cause hazardous substances or pollutants or contaminants to migrate or be released."

The Arbuckle Creek runs through the site and is subject to flooding. PCBs are known to migrate, thus residences along the flood plains of the Arbuckle are at risk of exposure.

IV. ENFORCEMENT

See Attached Confidential Enforcement Memorandum.

V. PROPOSED ACTIONS AND COSTS

A. Proposed Actions

The proposed actions for the Shaffer Equipment Site are designed to eliminate the imminent threat to public health and the environment posed by the presence of hazardous substance at the site. The three-phase proposed action is as follows:

- | | | |
|-----------|----|---|
| Phase I: | 1. | Mobilize contractor equipment and establish an onsite command post. |
| Phase II: | 1. | Excavate areas to one foot where contamination is 50 ppm (action level) or greater. |
| | 2. | Resample the excavated areas to ensure cleanliness of site. |

ORIGINAL
(Red)

*****DRAT*****

V. RECOMMENDATIONS

Because the conditions at the Shaffer Equipment Site continue to meet the criteria for a removal action under Section 104(c) of CERCLA, as amended by SARA, and the criteria for continued response actions under the National Contingency Plan, 40 CFR, Section 300.415, I recommend that you approve this \$704,790 ceiling increase. Your approval will raise the total project ceiling to \$4,460,237, of which \$678,526 is for extramural cleanup contractor costs. You may indicate your approval or disapproval by signing below.

APPROVED _____ DATE _____

DISAPPROVED _____ DATE _____

ATTACHMENTS: Previous funding documents